



April 19, 2013

Project No. 12013-0001

Mr. Robin Morse  
Crain, Caton & James, P.C.  
Five Houston Center  
1401 McKinney Street, 17<sup>th</sup> Floor  
Houston, Texas 77010

Re: ***Limited Phase II Environmental Site Assessment  
Joy Tabernacle Property  
4922 Griggs Road  
Houston, Harris County, Texas 77021***

Dear Mr. Morse:

SKA Consulting, L.P. (SKA) is pleased to submit our report of findings related to a Limited Phase II Environmental Site Assessment (Phase II ESA) for the above-referenced property located at 4922 Griggs Road, in Houston, Harris County, Texas (see **Figure 1**). The results of the Limited Phase II ESA are discussed in the following sections.

## **SITE BACKGROUND**

The subject property is an approximately 9.96-acre rectangular shaped tract of land located at 4922 Griggs Road, in Houston, Harris County, Texas. The subject property consists of a vacant church building, a vacant storage building, concrete paved parking and driveway area, and undeveloped land. The vacant church building, vacant storage building, and concrete paved parking and driveway area are located in the northern portion of the property and were formerly utilized by Joy Tabernacle Church. The undeveloped portion of the subject property located south of the site improvements is a grass and tree covered area which was formerly utilized as a mobile home park. As background for this investigation, SKA has received and reviewed the following environmental reports on the subject property:

- *Phase I Environmental Site Assessment* prepared by Phase Engineering, Inc., March 2009.
- *Limited Phase II Environmental Site Assessment* prepared by Quantum Environmental Consultants, Inc. for Hope for Families, Inc., June 4, 2009.
- *Soil Remediation Cost Analysis* prepared by Source Environmental Sciences, Inc. for the Hall Law Firm, July 27, 2010.

Copies of these previous reports are attached. In addition an SKA representative visited the subject property and surrounding area on March 13, 2013.

**Phase I Environmental Site Assessment prepared by Phase Engineering, Inc., March 2009.**

The Phase I ESA report by Phase Engineering, Inc. did not find any evidence of on-site activities that could lead to environmental impairment of the subject property. The Phase I ESA did find 9 listings (5 separate sites) in an environmental regulatory database within 0.1 mile of the subject property. The Phase I ESA concluded no recognized environmental conditions (RECs) existed in connection with the subject property, and no further environmental investigations were warranted.

**Limited Phase II Environmental Site Assessment prepared by Quantum Environmental Consultants, Inc.**

The Limited Phase II ESA performed by Quantum Environmental Consultants, Inc. (Quantum) consisted of the installation of three temporary monitoring wells (TMW-1, TMW-2, and TMW-3) along the western subject property boundary. Approximate temporary monitoring well locations can be seen in the Site Plan in **Figure 2**. The temporary monitoring wells were apparently not surveyed for location or elevation. The depth of groundwater was only generally reported as 20-30 feet below ground surface (ft-bgs).

Three soil samples were collected from each temporary monitoring well and were tested in the laboratory for Resource Conservation and Recovery Act (RCRA) metals, total petroleum hydrocarbons (TPH), and volatile organic compounds (VOCs). The laboratory analytical results were reported below the method detection level (MDL) for TPH, and detected RCRA metals concentrations appear to be naturally-occurring background concentrations. A VOC compound, tetrachloroethene (PCE), was detected in soil samples from soil boring SB-1 and SB-2. The PCE concentration in soil sample SB-2 (2-5) was 0.082 milligrams/kilogram (mg/kg), which exceeded the most conservative Texas Commission on Environmental Quality (TCEQ) soil protective concentration level (PCL) of 0.050 mg/kg (<sup>GW</sup>Soil<sub>Ing</sub> PCL).

Groundwater samples were also collected from each temporary monitoring well for RCRA metals, TPH, and VOC analysis. The groundwater sample results were below the MDL for TPH, and the RCRA metals concentrations were below the most conservative TCEQ PCLs for groundwater. PCE and/or its degradation products were found in each monitoring well. The PCE concentrations in TMW-1 and TMW-2 were 0.53 milligrams/liter (mg/L) and 9.6 mg/L, respectively, which exceeded the most conservative TCEQ PCE groundwater PCL (<sup>GW</sup>GW<sub>Ing</sub>) of 0.005 mg/L.

Based on the results of the Limited Phase II ESA, Quantum concluded that possible sources of PCE in groundwater could be CES Environmental Services at 4900 Griggs to the west of the subject property, or the former Advance Cleaners at 5056 Griggs to the east of the subject property.

### **Soil Remediation Cost Analysis prepared by Source Environmental Sciences, Inc.**

The Soil Remediation Cost Analysis prepared by Source Environmental Sciences, Inc. (Source) included additional soil and groundwater sampling; however, tabulated data and analytical reports were omitted from the Soil Remediation Cost Analysis. From the text and maps in the Soil Remediation Cost Analysis, it appears groups of 3 soil borings were completed north, east, south, and west of the locations of temporary monitoring wells TMW-1 and TMW-2 from Quantum's Limited Phase II ESA, for a total of 12 soil borings. Two soil samples were collected from each soil boring at 2-5 ft-bgs and 6-10 ft-bgs and analyzed for VOC and semi-volatile organic compounds (SVOCs). A total of 19 of the 24 soil samples had detections of PCE and 10 of the 24 soil samples had PCE concentrations exceeding the TCEQ soil <sup>GW</sup>Soil<sub>ing</sub> PCL.

Source also installed 3 more temporary monitoring wells (TMW-4A, TMW-5A, and TMW-6A). TMW-4A is near the eastern property boundary and TMW-6A is near the western property boundary, both about half-way north-to-south between TMW-1 and TMW-2 from Quantum's Limited Phase II ESA. TMW-5A was installed about 100-150 feet north of TMW-1. According to the Soil Remediation Cost Analysis, PCE concentrations in TMW-4A, TMW-5A, and TMW-6A exceeded the TCEQ groundwater <sup>GW</sup>GW<sub>ing</sub> PCL, though the reported PCE concentrations could not be confirmed by a review of the analytical reports.

### **Historical City Directory Search and Site Reconnaissance performed by SKA**

The Phase I ESA Report prepared by Phase Engineering referenced historical city directory research, though this material was not included in the Phase I ESA Report provided to SKA. Therefore, SKA contracted Environmental Data Resources, Inc. (EDR) to perform a historical city directory search at 4910 Griggs Road which is a warehouse property located adjacent west of the subject property's vacant church building. Additionally, EDR searched historical city directories for the subject property and surrounding properties in the subject area. Results of the EDR historical city directory search revealed that a dry cleaner (Palms Cleaners) was located on the northwestern portion of the subject property in the lot currently improved with the vacant church building (4912 Griggs Road). The former dry cleaner was reported in operation in 1971 and 1975. The exact periods of operation for Palms Cleaners are not known. Copies of the City Directory Search are included in Supporting Documentation in **Appendix 4**.

SKA conducted a driving survey of the surrounding area and located the former Advance Cleaners at 5056 Griggs Road, on the western end of the shopping center at Griggs Road and Schroeder Street. Also, two monitoring wells and an abandoned lint trap were observed behind the 5056 Griggs suite. A review of TCEQ Voluntary Cleanup Program (VCP) and Dry Cleaner Remediation Program (DCRP) databases did not indicate that the former Advance Cleaners is enrolled in either program. A review of Texas Water Development Board (TWDB) records indicate that a total of 4 monitoring wells were drilled at Advance Cleaners in November 2011.

## **SUBSURFACE INVESTIGATIONS**

The historical data collected to date indicates the subject property's soil and groundwater is impacted by PCE and its degradation products. The objective of the Limited Phase II ESA was

to fill in the data gaps from previous site investigations, confirm the concentrations of VOCs in the subject property's soil and groundwater, provide a more clear indication of the potential PCE source(s), and provide information to formulate an appropriate regulatory closure strategy for the subject property.

The Limited Phase II ESA was performed in general accordance with recognized industry standards and specific guidelines contained in ASTM E1903-97 [2002] ("Standard Guide for Environmental Site Assessment: Phase II Environmental Site Assessment Process").

### **Groundwater Monitoring Well Installation**

On March 28, 2013, SKA installed three permanent groundwater monitoring wells (MW-1, MW-2, MW-3) on the subject property. The locations of the groundwater monitoring wells were chosen to reflect the areas of environmental impact that would coincide with historical site assessments. Groundwater monitoring wells would be installed near the locations of TMW-2, TMW-4A, and TMW-5A from the Quantum and Source studies. The monitoring wells were installed by Alpine Field Services of Houston, Texas, a State of Texas-licensed water well driller, using a truck-mounted, hollow-stem-auger drilling rig equipped with 5-foot-long, split barrel core samplers. Mr. John Sanders, Project Geologist with SKA, performed all drilling oversight and sampling activities.

Based on the soil type and field observations, SKA's personnel determined the completion depth and screen interval for each monitoring well in the field. The boreholes for the three monitoring wells were advanced to the first groundwater bearing unit (GWBU). The first GWBU for the subject property consisted of silty and clayey sands (SC) and was first encountered at 10 to 12 feet below ground surface (ft-bgs). The bottom of the first GWBU was detected at 34 ft-bgs in MW-1 and MW-2. The bottom of the first GWBU was not encountered in MW-3.

Completion depths for MW-1 and MW-2 were 35 ft-bgs. Each well screen was placed from the base of the borehole to 15 ft-bgs. The monitoring wells were constructed of 2-inch inner-diameter (ID), Schedule 40 PVC pipe, consisting of a 20-foot section of 0.010-inch factory-slotted PVC screen and a 15-foot section of blank PVC riser. The borehole annulus around the screened section was filled with 20/40-grade silica sand to approximately 2 feet above the screened interval, followed by a minimum 2-foot-thick bentonite/portland cement plug, and grouted to the surface.

The total depth for MW-3 was 45 ft-bgs, however, MW-3 was completed at 40 ft-bgs when the bottom of the first GWBU was not encountered. Well screen was placed from 40 ft-bgs to 15 ft-bgs. The monitoring well was constructed of 2-inch inner-diameter (ID), Schedule 40 PVC pipe, consisting of a 25-foot section of 0.010-inch factory-slotted PVC screen and a 15-foot section of blank PVC riser. The borehole annulus around the screened section was filled with 20/40-grade silica sand to approximately 2 feet above the screened interval, followed by a minimum 2-foot-thick bentonite/portland cement plug, and grouted to the surface.

All three monitoring wells were surface completed with 2-foot by 2-foot concrete pads, steel manhole covers, and locking well caps. Groundwater monitoring well locations are shown on

the Site Plan in **Figure 2**. Photographs taken by our personnel during groundwater monitoring well installation and sampling activities are included in Photographs in **Appendix 1**.

### **Soil Sampling Procedures**

Soil samples from the monitoring wells were collected continuously using 5-foot-long, split-barrel core samplers. Equipment decontamination was continuously performed during all drilling activities in accordance with applicable TCEQ, United States Environmental Protection Agency (EPA), and Occupational Safety & Health Administration (OSHA) guidelines. The split-barrel core samplers were washed with Alconox soap and rinsed with potable water prior to the collection of each new soil sample.

All soil samples were given to SKA's personnel for screening and classification utilizing the Unified Soils Classification System (USCS). To aid in the selection of soil samples for potential laboratory analyses, field screening of soil samples for organic vapor concentrations was conducted using a photo-ionization detector (PID) equipped with a 10.6-electron-volt (eV) bulb calibrated to 100 parts per million (ppm) isobutylene.

After each soil sample was visually logged by SKA's personnel, it was divided into two representative portions. One portion was placed into a plastic container, sealed, labeled, and temporarily stored on ice for preservation. The other portion was placed into another plastic container, sealed, and placed in direct sunlight to enhance the volatilization of environmentally sensitive constituents possibly present in the soil. The probe of the PID was inserted into the plastic container, and the reading from the PID was recorded. The results of the PID field screening of the soil samples indicated detectable organic vapor concentrations ranging from 1.2 ppm to 8.4 ppm in soil samples collected from the subject property. In general, soil samples were selected for analytical testing based on the greatest PID field screening results. No visual indications of adverse environmental conditions were observed in any of the soil samples during drilling.

Additional soil samples that were collected from the monitoring wells were placed on "hold" in the testing laboratory pending the initial analytical results. Appropriate chain of custody documentation was maintained for all samples submitted to the laboratory. Excess soil cuttings generated from the soil boring installations and sampling activities were placed into sealed and labeled 55-gallon, steel drums and temporarily stored on the subject property pending proper waste classification and disposal.

Soil descriptions and PID field screening results are included on the groundwater monitoring well logs in **Appendix 2**.

### **Groundwater Sampling Procedures**

Once installed, groundwater monitoring wells MW-1 through MW-3 were checked by SKA's personnel for depth to water and Non-Aqueous Phase Liquids (NAPLs), if present, with an electronic oil/water interface meter. No NAPL was noted in any of the wells completed on the subject property. The groundwater monitoring wells were then initially developed by using a submersible pump and dedicated, disposable tubing to remove fine particles from the well

screen, filter pack, and surrounding formation. A minimum of ten well volumes of groundwater was removed from each monitoring well during development. Groundwater generated during the development activities was placed into properly labeled and sealed 55-gallon drums and temporarily stored on-site pending proper waste disposition.

After allowing several days for the groundwater monitoring wells to properly recharge and equilibrate, SKA returned to the subject property on April 2, 2013 and initiated low-flow groundwater sampling activities for monitoring wells MW-1 through MW-3. All the groundwater monitoring wells were again checked for depth to water and NAPL, if present, with an electronic oil/water interface meter. Again, no NAPL was noted in any of the groundwater monitoring wells. The wells were then purged and sampled in general accordance with guidance contained in EPA publication EPA/540/S-95/504, *Low-Flow (Minimal Drawdown) Groundwater Sampling Procedures* (April 1996). During low-flow groundwater purging, the groundwater from each monitoring well was continuously monitored in the field for pH, turbidity, specific conductivity, dissolved oxygen, temperature, and oxidation/reduction potential (ORP) with a YSI 600XL portable water quality meter equipped with an in-line flow-through cell and new (disposable) polyethylene tubing. Additionally, depth to water and flow (pumping) rate were also continuously monitored. Field parameters were recorded on the groundwater sampling logs. Once a minimum of one well volume was removed and at least three parameters were stable for three consecutive measurements, a groundwater sample was collected from each monitoring well into appropriately preserved laboratory-supplied containers, labeled, and stored in an ice-filled chest for preservation and delivery to the testing laboratory. Groundwater sampling logs are included in **Appendix 2**.

Groundwater generated during the purging activities was placed into sealed and properly labeled 55-gallon drum and temporarily stored on-site pending proper waste disposition. Appropriate chain-of-custody documentation was maintained for all samples shipped to the laboratory.

### **Investigative Derived Wastes**

The drums of investigative derived wastes (IDW) containing soil cuttings (5 drums) and purge/development water (2 drums) generated during SKA's investigations are being temporarily staged on the subject property pending proper waste classification for disposal.

### **Groundwater Monitoring Well Surveying**

On April 2, 2013, SKA surveyed groundwater monitoring wells MW-1 through MW-3 that were completed on the subject property in an effort to determine the groundwater flow direction of the first GWBU beneath the subject property. The groundwater monitoring wells were surveyed to an arbitrary benchmark elevation of 100-feet located on the subject property. The top of casing and natural ground elevations were obtained for each groundwater monitoring well by SKA personnel. The results indicate that the shallow groundwater flow direction beneath the subject property is generally toward the southwest with a hydraulic gradient of 0.0052 feet per foot (ft/ft). SKA confirmed the gradient results by again measuring the static groundwater elevations of the groundwater monitoring wells on April 12, 2013. Results of the additional groundwater measurements confirmed the previous groundwater gradient direction. The results of the



groundwater measurement along with the survey data are presented on the Summary of the Groundwater Elevation Monitoring Data included in **Table 3**. Groundwater Gradient Maps are included as **Figure 3A and Figure 3B**.

### **Analytical Testing**

Soil and groundwater samples collected from groundwater monitoring wells MW-1 through MW-3 were analyzed in the testing laboratory for volatile organic compounds (VOCs) by EPA Method 8260. Soil samples were selected for analytical testing based on PID field screening results. These soil analytical results were compared to the TCEQ TRRP Tier 1 Residential Soil PCLs for a 0.5-acre source area. The groundwater analytical results were compared to the most conservative TCEQ TRRP Tier 1 Residential Groundwater PCLs.

The laboratory analyses were performed by ALS Laboratory Group (ALS) of Houston, Texas, which is an EPA-approved laboratory and inspected by the TCEQ. Additionally, ALS is a National Environmental Laboratory Accreditation Conference (NELAC)-accredited laboratory under the Texas Laboratory Accreditation Program. All analyses were performed in accordance with EPA-approved methods referenced in Title 40 of the Code of Federal Regulations (40 CFR) and/or "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods" (EPA SW-846), except for TPH which was performed with Texas Method 1005. The analytical methods for all of the analyses performed were based on achieving laboratory sample detection limits (SDLs) that are at or below the TCEQ's TRRP Tier 1 critical soil and groundwater PCLs. Laboratory reports and chain-of-custody documentation are included in **Appendix 3**.

### **Soil Analytical Results**

A total of three (3) soil samples were collected from the monitoring well MW-1 through MW-3 borings and submitted to the laboratory for analytical testing for VOCs. The soil samples were collected from the groundwater monitoring well borings at depths of 5ft -bgs through 12.5 ft-bgs. Soils samples collected from MW-1 and MW-3 exhibited detectable concentrations of PCE; however, none of the reported concentrations are above their respective critical TCEQ TRRP Tier 1 Residential <sup>GW</sup>Soil<sub>ing</sub> PCLs for a 0.5-acre source area; however, the limited number of these soil samples collected from the subject property may not be representative of the soil conditions of the site as a whole. Soil samples collected from MW-2 exhibited no detectable concentrations of VOC constituents. A summary of soil analytical results is presented in **Table 1**, and a soil chemical of concern (COC) concentration map is included as **Figure 4**.

### **Groundwater Analytical Results**

A total of three (3) groundwater samples were submitted to the laboratory for analytical testing from groundwater monitoring wells MW-1 through MW-3. The groundwater samples collected from monitoring wells MW-1, MW-2 and MW-3 exhibited detectable concentrations of PCE, trichloroethene (TCE), and cis-1,2-dichloroethene (cis-1,2-DCE). Concentrations of PCE within the groundwater samples collected from monitoring wells MW-1 (0.14 mg/L), MW-2 (0.014 mg/L) and MW-3 (4.4 mg/L) exceed the TRRP Tier 1 Residential groundwater PCL for PCE of 0.005 mg/L. Concentrations of TCE within the groundwater samples collected from monitoring well MW-3 (0.021 mg/L) also exceed the TRRP Tier 1 Residential groundwater PCL for TCE of

0.005 mg/L. However, concentrations of TCE in monitoring well MW-1 and concentrations of cis-1,2-DCE in monitoring well MW-3 were not above their respective TRRP Tier 1 Residential PCLs. No other VOCs were detected in the groundwater samples above their respective PCLs.

A summary of groundwater analytical results is presented in **Table 2**, and a groundwater COC concentration map is included as **Figure 5**.

## SUMMARY AND CONCLUSIONS

Based on the results of SKA's Limited Phase II ESA conducted at the subject property, the following conclusions are made:

- A total of three groundwater monitoring wells (MW-1 through MW-3) were installed on the subject property as part of this Limited Phase II ESA. A total of three soil samples were collected from groundwater monitoring wells (MW-1 through MW-3) and three groundwater samples (MW-1 through MW-3) were collected from the groundwater monitoring wells. These samples were analyzed in the testing laboratory for VOCs.
- Soil and groundwater analytical testing results were evaluated to the applicable individual constituent TCEQ TRRP Tier 1 PCLs for residential land use (0.5-acre source area for soils).
- The soil analytical testing results reported samples with concentrations of PCE that did not exceed TCEQ TRRP Tier 1 PCLs. The soil samples were collected from groundwater monitoring wells within the 5-12.5 ft-bgs range.
- The groundwater gradient for the uppermost GWBU beneath the subject property was measured on April 4, 2013 and April 12, 2013 and slopes generally toward the southwest with a hydraulic gradient of 0.0052 ft/ft.
- The groundwater analytical testing results reported concentrations of PCE within the groundwater samples collected from groundwater monitoring wells MW-1 (0.14 mg/L), MW-2 (0.014 mg/L) and MW-3 (4.4 mg/L) exceeding the TCEQ TRRP Tier 1 PCL of 0.005 mg/L. Concentrations of TCE in groundwater monitoring well MW-3 (0.021 mg/L) also exceeded the TRRP Tier 1 PCL of 0.005 mg/L.
- A former dry cleaning facility (Palms Cleaners, 4912 Griggs Road) was identified in the historical city directory search and appears to have existed on the subject property in the location of the present day vacant church building. Additionally, a former dry cleaner (Advance Cleaners, 5056 Griggs Road) is located upgradient from the subject property, and a former waste recycling facility (CES Environmental Services, 4900 Griggs Road) is located down gradient from the subject property. Based on the limited extent of this investigation, the exact source and extents of the identified groundwater impacts are unknown.



## RECOMMENDATIONS

The presence of a historical, on-site dry cleaners (Palms Cleaners) will negate the possibility of an Innocent Owner/Operator Program (IOP) certificate for the subject property owner. However, the historical on-site dry cleaner also opens the possibility to enter the subject property into the TCEQ's Dry Cleaner Remediation Program (DCRP). Even though Palms Cleaners is no longer in operation, the DCRP is available to property owners who have been affected by dry cleaning contamination. In the DCRP, the site assessment and remediation is conducted by the TCEQ through its contractors. The cost for the assessment and remediation, if needed, is born by the TCEQ. The requirements of the DCRP applicant are:

- Fulfill a \$5,000 deductible. The work performed by SKA to date fulfills this deductible.
- Cease PCE-based dry cleaning on-site. There are no active PCE-based dry cleaning operations on-site.
- Grant TCEQ and its contractors access to the property.
- Depending on the regulatory closure scenario, a deed recordation will likely be required.

Some potential drawbacks of the DCRP are that:

- The applicant would have to register the property with the DCRP and pay back registration fees and on-going registration fees. The back fees will likely amount to more than \$10,000.
- The DCRP is funded by registration fees and taxes on PCE. In general these funds are limited and the TCEQ must prioritize sites for work. It is possible that TCEQ may not initiate work on the subject property for several years after acceptance into the DCRP. Once work is initiated at the subject property, it may take several more years to achieve regulatory closure.
- The groundwater PCE plume very likely extends off-site to the west. The most likely closure remedy that the TCEQ will use is a plume management zone (PMZ). A PMZ requires a deed recordation for all properties that are affected by the contamination and are within the PMZ. To the west are a large number of smaller residential properties that are likely affected. There is a distinct possibility that one or more off-site property owners refuse to allow a deed recordation on their property and the PMZ remedy would fail.
- If the PMZ remedy fails, the only available remedy for the TCEQ will be active remediation. Based on the data collected to date, the groundwater PCE is very large (over 500 feet north to south and likely larger in the east to west direction), and the PCE concentrations are quite high (almost 2,000 times the regulatory limit). Remediation of such a large plume will likely take many years of treatment.

As an alternative to the DCRP, SKA recommends pursuing a Voluntary Cleanup Program (VCP) Certificate of Completion as the regulatory strategy that offers the most benefits to the client and future land owners. The VCP Certificate of Completion provides a liability protection to future landowners from additional regulatory liability to the State or Federal government for the covered contamination. The client may enjoy this liability protection if the subject property is placed in the VCP before taking title to the property. The VCP Certificate of Completion runs with the land and is recorded on the property deed. No such Certificate of Completion is provided by the DCRP. While in VCP, the applicant is also exempt from enforcement actions by TCEQ. Because of the liability release under VCP, assessment and response actions must focus on all environmental media and all contaminants. Prior studies have indicated that additional contaminants are not likely. The VCP Certificate of Completion offers an attractive regulatory closure goal for lenders and investors, while the DCRP process is more open-ended and may not result in a regulatory closure in the near future.

Under the VCP, an additional remedy, a Municipal Setting Designation (MSD), is available that is not available under the DCRP. The MSD process involves securing a City of Houston (City) ordinance whereby the City commits to provide potable water to the property in exchange for the property owner agreeing to restrict access to groundwater and to deed record the property to that effect. The TCEQ will then certify the City ordinance. The major advantage of the MSD is that deed recordation of off-site properties is not required as with the PMZ remedy available under the DCRP. The possibility of an off-site land owner derailing the regulatory closure process is eliminated with an MSD.

SKA has obtained several MSDs for other properties and the schedule for this process is well defined. SKA believes that an MSD and a VCP Certificate of Completion can be obtained for the subject property in 18 to 24 months. It is possible that the TCEQ under the DCRP would not even have begun work in this time frame.

There is no restriction against withdrawing from the VCP and entering the subject property into the DCRP at a future date if project conditions so warrant.

Mr. Robin Morse  
April 19, 2013  
Page 11

## CLOSING REMARKS

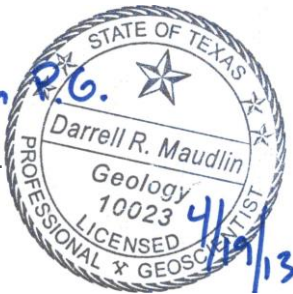
SKA appreciates the opportunity to be of assistance to you on this project. Should you have any questions, please do not hesitate to contact us at (713) 266-6056 or by email at [darrell.maudlin@skaconsulting.com](mailto:darrell.maudlin@skaconsulting.com) or [mike.schultz@skaconsulting.com](mailto:mike.schultz@skaconsulting.com)

Sincerely,

**SKA CONSULTING, L.P.**



Darrell R. Maudlin, P.G.  
Project Manager



Mike Schultz, P.E.  
Vice President and Partner

## Attachments:

Figure 1 -Site Vicinity and Topographic Map  
Figure 2 – Site Plan  
Figure 3A- Groundwater Gradient Map, April 2, 2013  
Figure 3B – Groundwater Gradient Map, April 12, 2013  
Figure 4 – Soil COC Concentration Map  
Figure 5 – Groundwater COC Concentration Map

Table 1 -Summary of Soil Analytical Results  
Table 2– Summary of Groundwater Analytical Results  
Table 3– Summary of Groundwater Elevation Monitoring Data

## Appendices:

Appendix 1 -Photographs  
Appendix 2 – Groundwater Monitoring Well Logs and Groundwater Sampling Logs  
Appendix 3 – Laboratory Documentation  
Appendix 4 – Previous Reports